

EXHIBIT C

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff,

Plaintiff,

v.

CITIBANK, N.A., CITIBANK NORTH
AMERICA, INC., AND CITIGROUP GLOBAL
MARKETS LIMITED,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05345 (SMB)

**[PROPOSED] ORDER GRANTING THE TRUSTEE'S MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

This cause having come before the Court on December 14, 2018 on the motion (“Motion”) of Irving H. Picard (“Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities, LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and Bernard L. Madoff, by and through his counsel, Baker & Hostetler LLP, seeking entry of an order, pursuant to Rule 15 of the Federal Rules of Civil Procedure, as

incorporated in this proceeding by Rule 7015 of the Federal Rules of Bankruptcy Procedure, granting the Trustee's request for leave to file an Amended Complaint; and the Court having considered the Memorandum of Law in Support of the Trustee's Motion for Leave to File an Amended Complaint; and any objections thereto; and due notice of the Motion having been given, and it appearing that no other or further notice need be given; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon the proceedings before the Court and after due deliberation, it is hereby

ORDERED THAT:

1. The Motion is GRANTED.
2. The Trustee is granted leave to file his Amended Complaint.

Dated: _____, 201____,
New York, New York.

HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE